

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONVERSE INC.,)	
)	CASE NO. 04-CV-12591 - PBS
Plaintiff,)	
)	
vs.)	
)	
ALON INTERNATIONAL S.A.,)	
)	
Defendant.)	
)	
)	

**CONVERSE'S ASSENTED-TO MOTION TO EXTEND DEADLINE FOR FILING ITS
RESPONSE TO ALON'S MOTION TO CONFIRM AND ITS MEMORANDUM IN
SUPPORT OF ITS MOTION TO VACATE ARBITRAL AWARD**

Plaintiff Converse Inc. ("Converse") hereby respectfully moves for a further two-week extension -- to September 6, 2006 -- of the deadline for the filing of its (a) response to Defendant Alon International S.A.'s ("Alon") Motion to Confirm and Enforce International Arbitral Award ("Converse's Response"), and (b) Memorandum in Support of its Motion to Vacate ("Converse's Memorandum").

As grounds for this motion, Converse states the following.

- 1) On August 7, 2006, the Court granted Converse's assented-to request of an extension to August 23, 2006 of the deadline to file Converse's Response and Converse's Memorandum, and set the deadline for Alon's response to Converse's Motion to Vacate to thirty (30) days thereafter;
- 2) The basis for that initial extension request was the parties' desire to discuss certain issues, including the confidentiality of the underlying arbitration award;

3) The parties have had initial discussions regarding such issues and consider that it would be fruitful for those discussions to continue for a further two-week period;

4) Accordingly, the parties have conferred and have concluded that it would be appropriate to seek a further extension of the deadline for Converse's Response and Converse's Memorandum to September 6, 2006.

Accordingly, the parties submit the following filing and briefing schedule for the Court's approval:

1. On or before September 6, 2006, Converse will file Converse's Response and Converse's Memorandum¹; and

2. Within thirty (30) days of the filing of Converse's Response and Converse's Memorandum, Alon will file any response thereto.

Converse thanks the Court for its consideration in this matter.

Respectfully submitted,

CONVERSE INC.
By its attorneys,

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¹ The parties have agreed that notwithstanding the extension of the filing date to September 6, 2006, Converse shall file the Converse Response and Converse Memorandum within three (3) calendar days of Converse's receipt of a written request from Alon, which notice Alon may give at any time before September 6, 2006 and without cause. Similarly Converse shall be free to file the Converse Response and Converse Memorandum at any time before September 6, 2006 three (3) calendar days after delivering written notice thereof to Alon.

/s/ Michael C. Gilleran
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Dated: Aug. 23, 2006

Certification Pursuant to Local Rule 7.1(A)(2)

Counsel for Converse hereby certifies that counsel for Converse conferred with counsel for Alon and Alon assented to this motion.

Certificate of Service

I hereby certify that this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to all other parties.

_____/s/ Michael C. Gilleran_____